

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES

V.

JEROME LASSITER

No. 04-10114-DPW

MOTION FOR DISCOVERY IN POSSESSION OF U.S. PRE-TRIAL SERVICES

The defendant, Jerome Lassiter, hereby moves this Court to direct the U.S. Pre-Trial Services Office to provide the defendant with a copy of the AdCare report discussed at the March 3, 2005 hearing in the above-named case. The Court relied in part on representations in the AdCare report in ordering the defendant's release to an in-patient drug treatment program. In support of this motion, the defendant states it is in the interests of justice to determine prior to his scheduled Rule 11 hearing what issues may exist potentially affecting the defendant's sentence in the event a plea of guilty is entered. The AdCare report information, including but not limited to an assessment of the defendant's drug dependence, is necessary and material to that determination.

JEROME LASSITER

By his attorney,

/s/ John H. Cunha Jr.

John H. Cunha Jr.

B.B.O. No. 108580

CUNHA & HOLCOMB, P.C.

One State Street, Suite 500

Boston, MA 02109-3507

617-523-4300

Dated: March 3, 2005